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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

THE HERTZ CORPORATION,	)	Case No.: 2:20-cv-01561-APG-BNW
	)	
Plaintiff,	)	STIPULATION TO EXTEND THE
	)	DISCOVERY DEADLINE
vs.	)	
	)	THIRD REQUEST
MARCOS LEON-SANCHEZ, et al.,	)	
	)	
Defendants.	)	

Plaintiff The Hertz Corporation ("Hertz") and Defendant Eroddys Carrillo Diaz ("Diaz"), by and through counsel, stipulate and agree as follows:<sup>1</sup>

WHEREAS, this matter involves an insurance coverage dispute involving claims arising from multiple vehicle accidents in which Hertz has alleged that the accidents may have been staged;

WHEREAS, pending before this Court is an Application for Contempt Orders [Dkt. No. 40], scheduled to be heard on March 21, 2022, associated with two (2) third party witnesses (Katherin Valdes Garcia, Marcos Leon Sanchez) who each failed to appear for depositions;

WHEREAS, this Court previously agreed to extend the discovery deadline to February 18, 2022 to permit for Plaintiff to complete the depositions of Diaz as well as various additional third party witnesses, including Liur Blanco ("Blanco"), Yanier Dieguez ("Dieguez"); Haydee Villazan ("Villazan") and Rommel Dolmusmunguia ("Rommel");

<sup>1</sup> While the First Amended Complaint [Dkt. No. 12] names other parties as defendants, none have appeared such that Hertz and Diaz are the only parties to this case.

1 WHEREAS, the deposition of Diaz is set for February 18, 2022;

2 WHEREAS, Liur, who failed to appear for his deposition set for January 24, 2022, has now  
3 retained counsel who is requesting that his deposition proceed forward in early March;

4 WHEREAS, Hertz, despite substantial effort, has been unable to locate and serve Villazan,  
5 Dieguez and Rommel with deposition subpoenas so as to complete their depositions by the current  
6 discovery deadline;

7 WHEREAS, it may be the case that contact information for Villazan, Dieguez and Rommel  
8 is developed and/or learned in connection with the depositions of Diaz and Liur;

9 WHEREFORE, the parties stipulate and agree to further extend the discovery deadline to  
10 April 1, 2022.

11 IT IS SO AGREED.

12 Dated: February 15, 2022

13 MORALES FIERRO & REEVES

TANNER CHURCHILL ANDERSON

14  
15 By /s/ William C. Reeves  
16 William C. Reeves  
Attorneys for Plaintiff

By /s/ Jared B. Anderson  
Jared B. Anderson  
Attorneys for Defendant

17  
18 The Court, having considered the stipulation of the parties and good cause appearing, orders  
19 that the deadline to complete discovery is extended to April 1, 2022.

20 IT IS SO ORDERED.

21 Dated: February 16, 2022.

22  
23 

District Court Magistrate Judge